

## REMARKS

Claims 14-15, 17-19, 23, 25-27, 30, and 32-34 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Kirani et al (U.S. Publication No. 2002/0032027A1) in view of Davis et al. (U.S. Publication No. 2002/0001395A1). In response, Applicants amended the claims to replace the phrase “internal data” with “character data” and further clarified the new format, and respectfully traverse the rejection based on these amendments.

As now defined in the amended claims, the internal data has been replaced with character data. Additionally, the phrase of a new format limiting and understanding of the information on the internal data has been replaced with a new format in which the original character data is not included and where recovery of the original character data is difficult. Support for these amendments can be found in Applicants’ Specification on page 8, line 27 to page 9, line 3. In particular, Applicants state that the first format is the original format of the data, such as character information, and the second format is a format where recovery of the original data is difficult, such as an image. Applicants respectfully submit that neither Kirani nor Davis disclose or suggest the features now recited in the amended claims.

More specifically, independent claims 17, 25 and 32 now recite the feature of converting the character data to a new format in which the original character data is not included and where recovery of the original character data is difficult. The outstanding Action relies upon paragraphs [0034] and [0159] of Davis for teaching this feature of previous claims 17, 25 and 32. The Office Action further relies upon FlashPix, JPEG, GIF, JPEG 200 file format conversion/compression, and FIG. 4 of Kirani for teaching a new format as recited in previous claims 17, 25 and 32. However, Applicants respectfully submit that these references fail to disclose or suggest the features of the amended claims.

Paragraph [0034] of Davis merely discloses that the image formatter includes an analog to digital converter to convert signals from the sensor elements to digital from a color space converter and map the signal into a desired color space, such as RGB or YUV. The formatter transforms the image signal into a form suitable for further processing and storage, and stores it in the camera's memory subsystem.

Paragraph [0159] of Davis merely discloses that persistent steganographic links to metadata ensure the persistence of an image's metadata through various operations. The operations include file conversion, file transmission, image compression and image editing. However, neither Kirani nor Davis disclose or suggest converting the character data to a new format in which the original character data is not included and where recovery of the original character data is difficult. For this reason, Applicants respectfully request withdrawal of the §103(a) rejection.

Claim 15 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Kirani in view of Davis, and further in view of Takemura (U.S. Patent No. 6,657,658). Applicants respectfully traverse the rejection for the reasons recited above with respect to the rejection of independent claim 14.

The deficiencies of Kirani and Davis are noted above. Takemura is merely cited for disclosing an image processing method to confirm where the processing set according to a desired finish of a picture actually results in a desired finish before the image is reproduced on a photographic print or a CRT according to a process image data. Applicants respectfully submit that Takemura fails to overcome the deficiencies of Kirani and Davis, and in particular to teach a feature of converting character data to a new format in which the original character data is not included and where recovery of the original character data is difficult. Accordingly, any

combination of Kirani, Davie and Takemura fail to disclose or suggest this feature. For this reason, withdrawal of the §103(a) rejection of claim 15 is respectfully requested.


For all of the foregoing reasons, Applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

If a Petition under 37 C.F.R. §1.136(a) for an extension of time for response is required to make the attached response timely, it is hereby petitioned under 37 C.F.R. §1.136(a) for an extension of time for response in the above-identified application for the period required to make the attached response timely. The Commissioner is hereby authorized to charge any additional fees which may be required to this Application under 37 C.F.R. §§1.16-1.17, or credit any overpayment, to Deposit Account No. 07-2069.

Respectfully submitted,  
GREER, BURNS & CRAIN, LTD.

**Customer No. 24978**  
May 14, 2009  
300 South Wacker Drive  
Suite 2500  
Chicago, Illinois 60606  
Telephone: (312) 360-0080  
Facsimile: (312) 360-9315

By:

  
Joseph P. Fox  
Registration No. 41,760

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